RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS
January 2022

Former General Electric Facility
500 N Ninth Street
Decatur, Indiana
U.S. EPA ID. IND 005422084

I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), regarding Former General Electric Facility, 500 N Ninth Street, Decatur, Indiana 46733. IDEM has determined that no further corrective action is necessary for any of the identified Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs) at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance, and is using the administrative procedures found in 40 CFR Part 270, as adopted by reference, to provide public notice and solicit comments. The public notice period is hereby announced and will continue for 30 days from the published date of the Public Notice in the Decatur Daily Democrat.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility's administrative record, which can be accessed via IDEM's Virtual File Cabinet (VFC). IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted under RCRA authority. IDEM may modify this corrective action determination or select another remedy based on public comments or new information obtained.

This determination will complete the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.

II. FACILITY BACKGROUND

GE manufactured electric motors at this facility from 1920 to 1989. The manufacturing processes included punch pressing, machining, stamping, grinding, welding, degreasing, washing, varnishing, epoxying, and painting. GE ceased all operations at the facility in 1989 and started removing all manufacturing equipment. All structures at the facility have been demolished.

The major waste streams at this facility were waste xylene (F003, D001), methylene chloride sludge (F002, D001), waste methyl ethyl ketone (MEK) (F005, D001, D035), waste mineral spirits (D001), waste maintenance paint (D001), waste petroleum naphtha (D001), waste 1,1,1 trichloroethane (TCA) (F001, D001), varnish sludge (F003), paint booth waste (D008), phosphate sludge, grinding sludge, waste paint filters, waste ash, used oil, waste coolant, scrap metal, and wastewater.

GE submitted a RCRA Part A to the U.S. EPA on February 16, 1982. The Part A listed a waste container storage area (S01) and the following wastes: F002, F003, F008, F017, and D001.

GE submitted a revised Part A on June 19, 1984. The revised form listed the following hazardous wastes for this facility: F001, F002, F003, F005, F008, F017, D001, and D007. In 1985, IDEM determined that D008 (paint booth waste) was an additional waste generated at the facility.

On February 24, 1986, GE submitted a request to reclassify this facility as a less than 90-day hazardous waste generator. IDEM informed GE the hazardous storage areas (SWMU 1 and SWMU 2) must undergo closure before reclassifying the facility as a large quantity generator. IDEM approved a closure plan for these units on June 3, 1987 and the closure verification inspection occurred on February 18, 1988. IDEM accepted closure certification for these units on May 2, 1988. At that time, the Decatur GE facility was reclassified as a less than 90-day hazardous waste generator. The facility maintained this classification until manufacturing operations ceased in 1989.

The last hazardous waste inspection of this facility occurred on February 18, 1988. No violations were observed or reported.

2.4 Regulatory

IDEM conducted a site visit on October 25, 2012, to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this visit, the following SWMUs and AOCs were evaluated:

SWMU 1	North Hazardous Waste Storage Area
SWMU 2	South Hazardous Waste Storage Area
SWMU 3	Waste Oil Storage Area
SWMU 4	Nonhazardous Waste Storage Area

SWMU 5	Loading Dock
SWMU 6	post-1990 Drummed Waste Storage Area
SWMU 7	Scrap Metal Collection Area
SWMU 8	Waste Xylene Satellite Accumulation Area (SAA)
SWMU 9	Waste MEK SAA
SWMU 10	Waste TCA SAA
SWMU 11	Steel Hoppers
AOC 1	Location of the Underground Storage Tanks
AOC 2	North PCB Release Area
AOC 3	South PCB Release Area
AOC 4	PCB Release Area Located in Building 1 south of the Loading Dock
AOC 5	PCB Release Area Located in Building 1 on the east and south side
AOC 6	Site-Wide Ground Water

None of the SWMUs or AOCs showed evidence of an existing release. Further information is available in the RCRA Facility Assessment (Addendum) (VFC # 68416589).

2.5 History of Documented Releases

GE reported two PCB-contaminated areas to IDEM in 1990 and 1991. The South PCB Release Area (AOC 3) was reported to IDEM on June 1, 1990. GE reported the North PCB Release Area (AOC 2) to IDEM on June 24, 1991. GE determined the routine servicing of transformers located in these areas caused the contamination. The contaminated soils were removed and the confirmation samples indicated all soils containing PCBs greater than 10 ppm were no longer present in both areas. These areas were backfilled with clean soil. IDEM determined no further action was required for these areas in late1991.

The October 12, 2012, RCRA facility site assessment visit noted two areas in Building 1 where GE had removed the concrete flooring. GE stated the detected levels of PCBs in these areas required removal of the flooring. GE stated PCBs were not detected in these soils. GE submitted reports documenting these removals to IDEM.

GE notified IDEM of four underground storage tanks (USTs) on February 4, 1991. These tanks stored number two fuel oil. Three of the USTs had a capacity of 10,000 gallons and one UST had a 30,000 gallons capacity. All four tanks were removed in 1991. GE's contractor collected soil samples and ground water samples from these excavations. The contaminated soils were removed and all confirmatory samples indicated that total petroleum hydrocarbon (TPH) was not

present above a laboratory detection limit of 100 ppm. TPH was not detected in the ground water.

Contamination in the soil was discovered throughout the site above the IDEM Remediation Closure Guide soil direct contact residential and commercial screening levels. The chemicals of concern for the site are polychlorinated biphenyls, volatile organic compounds, semi-volatile organic compounds, and metals.

2.6 Site Remediation

The facility entered the IDEM's Voluntary Remediation Program (VRP) in December 2013.

Various subsurface investigations, building investigation sampling efforts, and remedial actions have been completed to assess and address impacts associated with the historical use and storage of polychlorinated biphenyls, closure and removal of four former underground storage tanks, chemical storage areas, and termination of former operations at the site.

Nearly two hundred soil borings and fifteen monitoring wells were installed to delineate the contamination. The results from the borings indicated one or more metals, semi-volatile organic compounds, volatile organic compounds, and polychlorinated biphenyls above residential and commercial soil direct contact screening levels.

Total polychlorinated biphenyls were detected at concentrations exceeding the commercial/ industrial direct contact screening level in soil boring samples SB-15 (4-6) and SB-171 (0-1) and above residential direct contact screening level in soil boring samples P-10 (2-4), SB-15 (4-6), SB-49 (0-0.5), SB-91 (0-0.5), SB-96 (0-0.5), SB-171 (0-1), and duplicate SB-192 (4-6). Remedial excavation was performed to remove soils with polychlorinated biphenyls concentrations above direct contact screening levels from each of these areas, except for the SB-96 (0-0.5) area.

Trichloroethylene was detected at concentrations greater than excavation worker direct contact screening level in samples SB-42 (7.5-10) and SB-140 (7.5-10), which were collected beneath the former plating room. Additionally, soil boring samples exceeding the residential direct contact screening level for trichloroethylene was detected in samples SB-42 (3-5), SB-139 (6-7) duplicate, and SB-152 (7.5-10). Remedial excavation was performed to remove soils with trichloroethylene concentrations above direct contact screening levels from each of these areas.

One sample detected 1,1,2,2-trichloroethane at concentrations above the residential direct contact screening level in SB-16 (0.5-1.5).

Benzo(a)pyrene was detected at concentrations greater than commercia/industrial direct contact screening level in soil samples SB-46 (0-0.5) and SB-90 (0-0.5). Several samples across the site contained semi-volatile organic compounds above their respective residential direct contact soil

screening levels. Remedial excavation was performed to remove soils with benzo(a)pyrene concentrations above direct contact screening levels from each of these areas.

Several samples across the site contained arsenic, hexavalent chromium, lead, and/or thallium at concentrations above their respective residential or commercial/industrial direct contact screening levels. Remedial excavation was performed to remove soils with arsenic, hexavalent chromium, and lead concentrations above direct contact screening levels from each of these areas. A total of 4806.41 tons were removed and properly disposed of from seven excavations in late 2018 through January 2019. Sample locations SB-111 (0.5-1) and SB-155 (0-0.5) contain arsenic at concentrations above the commercial/industrial direct contact screening level and SB- 41(2.5-5) and SB-122 (1.5-2) contain hexavalent chromium at concentrations above the residential direct contact screening level.

GE reviewed the analytical data from soil samples collected June 2017 and concluded the thallium concentrations may be falsely elevated. GE proposed the collection of soil samples at select locations where elevated thallium concentrations had been previously reported and analysis of those samples using SW846 Method 6020 rather than Method 6010. The results from the new testing method showed that thallium was not present at levels above the IDEM screening levels.

The ground water monitoring wells P-1 through P-9 were installed in April 1991, P-10 in September 2014, and P-11 through P-15 were installed in May 2018. The ground water was sampled in 1992, 2013, 2014, 2018 and throughout 2019, and early 2020 for polychlorinated biphenyls, volatile organic compounds, semi-volatile organic compounds, and metals including hexavalent chromium. Monitoring well P-5 was abandoned in August 2018 to facilitate the sale of the parking lot. Total lead, total arsenic, and/or total chromium was detected in P-1, P-3, P-4, P-6, P-8, P-11, P-12, P- 13, and P-14. The dissolved samples did not yield the same constituents. However, results from P-2 and P-3 did show hexavalent chromium above the residential tap screening level. The consultant installed P-3R and resampled both P-3R and P-2 and concluded the grout used in the original wells created a localized microenvironment that allowed mobilization of hexavalent chromium. GE proposed to abandon all monitoring wells by over drilling and plugging with bentonite to remove any potentially damaged cement grout seals.

The Remediation Work Plan was submitted in June 2020 and the remedial objective was to eliminate the unacceptable risks by using institutional controls to restrict land use. The site used Remediation Closure Guidance screening levels updated through 2020. An Environmental Restrictive Covenant was recorded on the property to restrict residential use, extraction of groundwater, and agricultural use which mitigates the remaining risks on-site and allows the site to close.

The remaining site is covered in grass. The property is enclosed by a perimeter fence and the surrounding area includes residences and commercial businesses.

IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for all of the identified SWMUs and AOCs. IDEM is proposing that a Corrective Action Complete with Controls determination be issued for the Former General Electric facility. **"**With Controls**"** recognizes that General Electric recorded an Environmental Restrictive Covenant (ERC) (VFC # 83217815) prohibiting certain uses, including residential, daily childcare facilities or educational facilities for children, and agricultural. In addition, the ERC prohibits the extraction or use of ground water, unless it is extracted in conjunction with environmental investigation and/or remediation activities.

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of past spills and/or releases that have occurred at this facility. You may request IDEM hold a public hearing or a public meeting. At a public hearing, you would have the opportunity to submit oral or written comments. At a public meeting, you would have an opportunity to submit written comments, ask questions, make statements, and otherwise discuss any concerns about the permit renewal with IDEM staff. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing/meeting 30 days in advance.

The Public Notice and the administrative record are available for review on IDEM's Virtual File Cabinet. To view these documents, go to http://vfc.idem.in.gov/. After checking the "I'm not a robot" box, select "Document ID" from the Alternate Field drop-down menu and then enter the document number in the ID # cell. VFC document numbers are provided in Section VI. below for the primary documents IDEM used to support this decision.

Before taking final action, IDEM will give full consideration to all significant and relevant comments received. IDEM will summarize the comments and its responses to the comments, and announce its decision in a Final Decision/Response to Comments document. This document will be incorporated into the administrative record. To send written comments or obtain further information, contact:

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VI. REFERENCES

Completion Report Approval, dated 10/20/2021 (VFC # 83230262)

Environmental Restrictive Covenant, dated 09/09/2021(VFC # 83217815)

Remediation Work Plan Approval, dated 07/29/2021 (VFC # 83190446)

Remediation Work Plan/Remediation Completion Report, dated 06/19/2021 (VFC # 82992673)

Response to IDEM Comments on Remediation Work Plan/Remediation Completion Report, dated 12/16/2020 (VFC # 83084432)

Remediation Work Plan Remediation Completion Report Review, dated 10/14/2020 (VFC # 83057489)

Further Site Investigation Review, dated 03/2/2019 (VFC # 82711014)

Completion of Independent Closure Process, dated 8/16/2017 (VFC # 80508231)

Site Investigation Work Plan, dated 06/27/2014 (VFC # 70174193)

Voluntary Remediation Agreement, dated 04/09/2014, (VFC # 69901587)

Voluntary Remediation Program Application, dated 12/16/2013 (VFC # 69355694)

Application Acceptance Former GE Decatur Motors, dated 12/30/2013 (VFC # 69412533)

RCRA Facility Assessment Report, dated 04/14/2013 (VFC # 68416589)

Request for All Site Data, dated 02/12/2013 (VFC # 67385896)

RCRA Facility Assessment Drat Report, dated 12/28/2012, (VFC # 67349856)

Preliminary Assessment/Visual Site Inspections, dated 3/17/1993 (VFC # 66908236)

Closure of Container Storage, dated 05/02/1988 (VFC # 67325443)

Modified Closure Plan Approval, dated 06/03/1987 (VFC # 70472812)

Closure Plan, dated 08/19/1986 (VFC # 80440780)

Closure Plan: General Electric, Co., dated 06/30/1986 (VFC # 70472839)

Part A General Electric, Co, dated 02/16/1982 (VFC # 67325444)